

December 21, 2018

Ex Parte

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12th St. SW Washington, D.C. 20554

Re: USTelecom Ex Parte Notice, WC Dkt. No. 10-90, Connect America Fund

Dear Ms. Dortch:

On December 19, 2018, representatives of USTelecom, AT&T, CenturyLink, Verizon and Windstream (USTelecom Members) met with FCC Wireline Bureau Staff as well as USAC High Cost and Office of General Counsel staff; the full list of participants is below.

The purpose of the meeting was to discuss measuring compliance with the Connect America Fund Phase II model-based support program broadband deployment milestones, specifically with respect to reporting geolocations into the USAC High Cost Universal Broadband (HUBB) portal. USTelecom noted the need to update the HUBB periodically, including the ability to make bulk edits that reflect real-world changes to served locations as well as geocoding modifications. USTelecom Members also discussed the practical difficulties associated with geocoding "served" locations to an accuracy level of six decimal points (four inches) in rural America. USTelecom Members urged for a lesser standard that would still provide accuracy within feet—a standard more suitable for sparsley populated rural areas.

Please contact me with any questions.

____/s/____

Sincerely,

Mike Saperstein Vice President, Law & Policy

cc: Meeting Participants

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Meeting Participants

FCC: Alex Minard, Jesse Jachman, Nissa Laughner, and Gilbert Smith

USAC: Sammy Khan, Meagan Sunn, Joelle Tessler, Tim Weith, Romanda Williams, and Sherika Wynter attended in person. Amanda Bilodeau, Edward Bliss and Elizabeth Pertsevoi attended via phone.

AT&T: Mary Henze attended in person with Cathy Carpino via phone

CenturyLink: Jeff Lanning in person with Ken Buchan, Richard Rousselot and Tiffany Smink via phone

USTelecom: Mike Saperstein in person with B. Lynn Follansbee via phone

Verizon: Alan Buzacott

Windstream: Thomas Whitehead via phone